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MEMO ENDORSED

January 30, 2020

VIA ECF

The Honorable Valerie Caproni
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 443
New York, New York 10007

Re: *Interested Lloyds Underwriters v. DHL Global Forwarding*
Docket No. 1:19-cv-11493-VEC

Dear Judge Caproni:

We represent plaintiff, Interested Lloyds Underwriters, in this action and write to request an adjournment of the February 7, 2020 Initial Pretrial Conference.

This is a subrogation action against DHL Global Forwarding for the total loss of cargo transported from South Carolina to Santiago, Chile. Plaintiff insured Pegasus for a shipment of a refrigerated container of 2300 pieces of Dukes mayonnaise from South Carolina to Santiago, Chile. DHL Global Forwarding was engaged as the carrier to transport the shipment and issued a clean bill of lading number SEAU 578945069. The temperature of the refer container was to be set at +18.3 C. The cargo was delivered to DHL Global Forwarding in good order and condition, yet it was received in Santiago, Chile in damaged condition and was a total loss. Thus, Pegasus suffered a total loss of the shipment in the amount of \$42,854.00. Pegasus made a claim against Interested Underwriters under Policy Number B0595JY864018J, which was called upon to pay and have paid the sum of \$42,854.00 to Pegasus, inclusive of a \$5000.00 deductible.

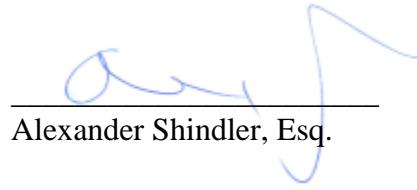
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We request the adjournment because we have been engaged in settlement discussions with defendant and have thus not served the complaint. During settlement discussions, we have learned that defendant may have additional corporate names associated with its business, so we will need to amend the complaint accordingly. This is our first request for the adjournment, and we have been unable to reach incoming counsel on behalf of defendant to obtain its consent. The proposed alternate dates for the conference are March 13 or March 20, 2020 at 10:00 a.m.

We thank the Court for its time and consideration to these matters.

Very truly yours,

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.


Alexander Shindler, Esq.

The initial conference is adjourned to **March 13, 2020, at 10:00 A.M.**
Joint pre-conference submissions are due by **March 6, 2020.**

SO ORDERED.

Date: 01/30/2020


HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE